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BOARD OF TRUSTEES OF THE CALIFORNIA
STATE UNIVERSITY and individual defendants
(see complete list of individual defendants on signature page)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTINE DiBELLA,

Plaintiff,

v.

BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY;
STEVE RELYEA, Acting Chancellor of
California State University, in his official
capacity; JOLENE KOESTER, incoming
Interim Chancellor of California State
University, in her official capacity; and
JEFFREY D. ARMSTRONG, President of
California Polytechnic State University,
San Luis Obispo, in his official capacity;
ERIKA D. BECK, President of California
State University, Northridge, in her official
capacity; SORAYA M. COLEY, President
of California Polytechnic State University,
Pomona, in her official capacity; JANE
CLOSE CONOLEY, President of
California State University, Long Beach, in
her official capacity; WILLIAM A.
COVINO, President of California State
University, Los Angeles, in his official
capacity; THOMAS A. CROPPER,
President of California State University
Maritime Academy, in his official capacity;
ADELA DE LA TORRE, President of San
Diego State University, in her official

CASE NO. 4:21-cv-08461-HSG

**STIPULATION AND ORDER SETTING
DEADLINE FOR DEFENDANTS TO
RESPOND TO SECOND AMENDED
COMPLAINT**

capacity; GAYLE E. HUTCHINSON, President of California State University, Chico, in her official capacity; TOM JACKSON, JR., President of California Polytechnic State University, Humboldt, in his official capacity; SAÚL JIMÉNEZ SANDOVAL, President of California State University, Fresno, in his official capacity; ELLEN N. JUNN, President of California State University, Stanislaus, in her official capacity; LYNN MAHONEY, President of San Francisco State University, in her official capacity; TOMÁS D. MORALES, President of California State University, San Bernardino, in his official capacity; ROBERT S. NELSEN, President of California State University, Sacramento, in his official capacity; ELLEN J. NEUFELDT, President of California State University, San Marcos, in her official capacity; EDUARDO M. OCHOA, President of California State University, Monterey Bay, in his official capacity; THOMAS A. PARHAM, President of California State University, Dominguez Hills, in his official capacity; STEPHEN PEREZ, President of San Jose State University, in his official capacity; JUDY K. SAKAKI, President of Sonoma State University, in her official capacity; CATHY A. SANDEEN, President of California State University, East Bay, in her official capacity; FRAMROZE VIRJEE, President of California State University, Fullerton, in his official capacity; RICHARD YAO, President of California State University, Channel Islands, in his official capacity; LYNNETTE ZELEDNY, President of California State University, Bakersfield, in her official capacity; COMPASS GROUP USA, INC. dba CHARTWELLS HIGHER EDUCATION,

Defendants.

STIPULATION

Plaintiff CHRISTINE DiBELLA (“Plaintiff”), on the one hand, and Defendants BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY; STEVE RELYEA, Acting

1 Chancellor of California State University, in his official capacity; JOLENE KOESTER, incoming
 2 Interim Chancellor of California State University, in her official capacity; and JEFFREY D.
 3 ARMSTRONG, President of California Polytechnic State University, San Luis Obispo, in his
 4 official capacity; ERIKA D. BECK, President of California State University, Northridge, in her
 5 official capacity; SORAYA M. COLEY, President of California Polytechnic State University,
 6 Pomona, in her official capacity; JANE CLOSE CONOLEY, President of California State
 7 University, Long Beach, in her official capacity; WILLIAM A. COVINO, President of California
 8 State University, Los Angeles, in his official capacity; THOMAS A. CROPPER, President of
 9 California State University Maritime Academy, in his official capacity; ADELA DE LA TORRE,
 10 President of San Diego State University, in her official capacity; GAYLE E. HUTCHINSON,
 11 President of California State University, Chico, in her official capacity; TOM JACKSON, JR.,
 12 President of California Polytechnic State University, Humboldt, in his official capacity; SAÚL
 13 JIMÉNEZSANDOVAL, President of California State University, Fresno, in his official capacity;
 14 ELLEN N. JUNN, President of California State University, Stanislaus, in her official capacity;
 15 LYNN MAHONEY, President of San Francisco State University, in her official capacity;
 16 TOMÁS D. MORALES, President of California State University, San Bernardino, in his official
 17 capacity; ROBERT S. NELSEN, President of California State University, Sacramento, in his
 18 official capacity; ELLEN J. NEUFELDT, President of California State University, San Marcos,
 19 in her official capacity; EDUARDO M. OCHOA, President of California State University,
 20 Monterey Bay, in his official capacity; THOMAS A. PARHAM, President of California State
 21 University, Dominguez Hills, in his official capacity; STEPHEN PEREZ, President of San Jose
 22 State University, in his official capacity; JUDY K. SAKAKI, President of Sonoma State
 23 University, in her official capacity; CATHY A. SANDEEN, President of California State
 24 University, East Bay, in her official capacity; FRAMROZE VIRJEE, President of California State
 25 University, Fullerton, in his official capacity; RICHARD YAO, President of California State
 26 University, Channel Islands, in his official capacity; LYNNETTE ZELEDNY, President of
 27 California State University, Bakersfield, in her official capacity (collectively, “Defendants”) –
 28 Plaintiff and Defendants together the “Parties” – hereby stipulate and request that the deadline for

Defendants to file their response to Plaintiff's Second Amended Complaint ("SAC") be set at March 31, 2022. This request to continue deadlines is based on the following good cause:

1. On April 21, 2022, Plaintiff filed a 63-page SAC for Preliminary and Permanent Injunctive Relief, Declaratory Relief, and Damages. Dkt. No. 36.
2. The SAC names twenty five (25) new defendants, including STEVE RELYEA, the Acting Chancellor of California State University, JOLENE KOESTER, the incoming Interim Chancellor of California State University, in her official capacity, and the Presidents of each California State University campus.
3. Due to the complexity and broad scope of the SAC, Defendants require additional time to investigate the new allegations and prepare their responsive pleadings.
4. Further, because the individual defendants' responsive pleading deadlines are different than the responsive pleading deadline for the Board of Trustees of the State of California, setting a global deadline allows for a joint filing.
5. Pursuant to the above, the Parties jointly stipulate that a new deadline of May 31, 2022 shall be set for Defendants to respond to the SAC.

IT IS SO STIPULATED.

Date: May 19, 2022

REIN & CLEFTON, Attorneys at Law

/s/ Aaron M. Clefton, Esq.
By AARON M. CLEFTON, Esq.
Attorneys for Plaintiff
CHRISTINE DiBELLA

Date: May 19, 2022

CLYDE & CO US LLP

/s/ Alison K. Beanum, Esq.
By ALISON K. BEANUM, Esq.
Attorney for Defendant
BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY; STEVE
RELYEA, Acting Chancellor of California State
University, in his official capacity; JOLENE
KOESTER, incoming Interim Chancellor of
California State University, in her official capacity;
and JEFFREY D. ARMSTRONG, President of
California Polytechnic State University, San Luis
Obispo, in his official capacity; ERIKA D. BECK,

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 6 University, Long Beach, in her official capacity;
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 10 California State University Maritime Academy, in
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 12 President of San Diego State University, in her
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 20 N. JUNN, President of California State University,
 21 Stanislaus, in her official capacity; LYNN
 22 MAHONEY, President of San Francisco State
 23 University, in her official capacity; TOMÁS D.
 24 MORALES, President of California State
 25 University, San Bernardino, in his official capacity;
 26 ROBERT S. NELSEN, President of California State
 27 University, Sacramento, in his official capacity;
 28 ELLEN J. NEUFELDT, President of California
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 his official capacity; STEPHEN PEREZ, President
 of San Jose State University, in his official capacity;
 JUDY K. SAKAKI, President of Sonoma State
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 East Bay, in her official capacity; FRAMROZE
 VIRJEE, President of California State University,
 Fullerton, in his official capacity; RICHARD YAO,
 President of California State University, Channel
 Islands, in his official capacity; LYNNETTE
 ZELEZNY, President of California State University,
 Bakersfield, in her official capacity

FILER'S ATTESTATION

Pursuant to Local Rule 5-1, I hereby attest that on May 19, 2022, I, Alison Beanum, attorney with Clyde & Co US LLP, received the concurrence of Aaron Clefton, Esq. in the filing of this document.


/s/ Alison K. Beanum
Alison K. Beanum

ORDER

Pursuant to the stipulation of the parties and for good cause shown, the deadline for Defendants to respond to the SAC shall be continued to May 31, 2022.

IT IS SO ORDERED.

Dated: 5/20/2022


Honorable Haywood S. Gilliam, Jr.
U.S. District Court Judge